

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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RYAN CHANDLER,

Plaintiff,

**DEFENDANTS'
PROPOSED VERDICT
FORM**

-against-

CITY OF MOUNT VERNON,
POLICE OFFICER PATRICK KING,
POLICE OFFICER ROBERT G. PUFF,
POLICE OFFICER MICHAEL P. MOCULSKI,
POLICE OFFICER PHILLIP J. LEONTI,

18-cv-10145(NSR)(JCM)

Defendants.

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Defendants CITY OF MOUNT VERNON, POLICE OFFICER PATRICK KING,
POLICE OFFICER ROBERT G. PUFF, POLICE OFFICER MICHAEL P. MOCULSKI, and
POLICE OFFICER PHILLIP J. LEONTI ("Defendants") hereby submit the following proposed
verdict sheets to be presented to the Jury:

VERDICT SHEET

1. Do you find that Plaintiff has proven, by a preponderance of the evidence, that Police Officer Patrick King violated Plaintiff's right to be free from excessive force?

YES_____

NO_____

2. Do you find that Plaintiff has proven, by a preponderance of the evidence, that Police Officer Robert G. Puff violated Plaintiff's right to be free from excessive force?

YES_____

NO_____

3. Do you find that Plaintiff has proven, by a preponderance of the evidence, that Police Officer Michael Moculski violated Plaintiff's right to be free from excessive force?

YES_____

NO_____

4. Do you find that Plaintiff has proven, by a preponderance of the evidence, that Police Officer Phillip Leonti violated Plaintiff's right to be free from excessive force?

YES _____

NO _____

If you answered "NO" for all four questions, please end your deliberations, sign and date the verdict form and report it to the Clerk. If you answered "YES" for one or more questions, proceed to Question 5.

5. Do you find that Plaintiff has proven, by a preponderance of the evidence, that the City of Mount Vernon violated Plaintiff's right to be free from excessive force by failing to train and/or supervise its employees?

YES _____

NO _____

If you answered "YES" to any of the questions above, please proceed to the following Question.

6. Do you find that any of the Defendants should be liable for punitive damages? (Please do not write an amount).

YES _____

NO _____

Please sign and date the form and tell the marshal that the jury has reached a verdict.

Dated:

FOREPERSON

WHEREFORE, Defendants respectfully submit the proposed verdict form as set forth herein. Defendants respectfully reserve the right to amend or supplement this proposed verdict form.

Dated: White Plains, New York
November 19, 2021

Respectfully submitted,



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